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8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**
(HON. ROGER BENITEZ)

10 UNITED STATES OF AMERICA,)	Case No. 08-CR-0511-4-BEN
)	
11 Plaintiff,)	NOTICE OF MOTION AND MOTION
)	FOR DISCOVERY; TO DECLARE
12 v.)	CASE COMPLEX; AND FOR LEAVE
)	TO JOIN MOTIONS FILED BY
13 MAGGIE SIEBEN,)	OTHER COUNSEL; AND FOR
)	LEAVE TO FILE FURTHER
14 Defendant.)	MOTIONS
_____)	
15		DATE:
16		TIME:
		DEPT:

17 TO: PLAINTIFF UNITED STATES OF AMERICA AND ITS ATTORNEY OF
18 RECORD, KAREN P. HEWITT, UNITED STATES ATTORNEY FOR THE SOUTHERN
19 DISTRICT OF CALIFORNIA; AND ASSISTANT U.S. ATTORNEY TIMOTHY F.
20 SALEL.

21 Please take notice that at the above designated time and place, defendant Maggie
22 Sieben will move the court for an order compelling discovery in the instant case with respect
23 to the items set forth in the attached memorandum of law, based upon the constitutional,
24 statutory, and judicial authorities cited herein. Defense counsel will further move the court to
25 have case declared complex and for leave to join the motions filed in this matter by other
26 counsel unless specifically exempted therefrom, and for leave to file further motions.

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1 Said motion is based upon the instant notice of motion, the attached memorandum of
2 law, and on such evidence and argument as may be presented at the hearing on the motion.

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4 Date: April 7, 2008

Respectfully submitted,

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6 /s/ Paul W. Blake
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